

Children's Privacy Policy

Issued by: Infinito Comics Private Limited

Effective Date: 15th August, 2025

Jurisdiction: Republic of India

At Infinito Comics, we consider it our legal, ethical, and social responsibility to provide a safe, respectful, and legally compliant digital space for children and families. This Children's Privacy Policy reflects our non-negotiable commitment to protecting minors, in accordance with Indian statutory, constitutional, and regulatory mandates, and serves as a legal safeguard to demonstrate due diligence against any accusation of misconduct or negligence.

1. Scope and Binding Nature of this Policy

This Policy governs the collection, storage, usage, protection, and deletion of children's data (under the age of 18) on the Infinito Comics website. By accessing our platform, users (including parents, teachers, or legal guardians) acknowledge and accept that:

- This Policy is enforceable under the Indian Contract Act, 1872, and all data operations follow the Digital Personal Data Protection Act, 2023 (DPDPA) and Information Technology Act, 2000, especially Section 43A and Section 72A.
- The policy is binding on our company, directors, employees, and third-party contractors who interact with or process children's data.

2. Strict Adherence to Indian Child Safety and Data Protection Laws

We unequivocally affirm that Infinito Comics is not only designed for children but is engineered with legal guardrails and ethical standards to protect minors, including:

- Complying with Rule 4 of the Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021, which mandates platforms to remove harmful content to children;
- Ensuring zero tolerance for any violation of the Protection of Children from Sexual Offences (POCSO) Act, 2012, including Section 11 and 12 (showcasing sexually explicit or obscene content);

- Implementing parental verification, content filtering, and data minimization as prescribed under the Digital Personal Data Protection Act, 2023, and Juvenile Justice (Care and Protection of Children) Act, 2015.

3. Information We Collect from Children

We do not collect any personal data from children without verified parental or guardian consent, in compliance with Section 9 of the Digital Personal Data Protection Act 2023 (DPDPA). The following data is collected in a restricted and monitored manner:

- First name or screen name (non-identifiable);
- Age group (to provide age-appropriate content only);
- Parent or guardian's verified email and mobile number;
- Behavioral data limited to reading progress (non-tracking, anonymized);
- IP address and device metadata for fraud prevention only (never shared).

No biometric, financial, geolocation, or sensitive personal data is collected.

4. Parental Consent and Oversight

All data collection is subject to prior parental consent, verified via secure OTP and/or digital signature. Our Parental Dashboard allows guardians to:

- Approve or reject profile creation;
- Access all stored data;
- Delete their child's data at any time;
- Block specific content or limit screen time.

This is in alignment with Section 4 and 5 of the Digital Personal Data Protection Act 2023 (DPDPA) which mandates "consent by lawful guardian" in case of minors.

5. Prohibited Activities and Automated Content Filters

Infinito Comics proactively bans and filters all the following from its platform:

- Obscene, violent, sexual, or abusive content;
- Inappropriate advertisements or external links;
- Interactions with unverified or adult users;
- User-generated content without admin moderation.

We use AI-based filters, human moderators, and age-tagging to enforce this. Any breach is escalated to the Grievance Officer and, if necessary, local cyber police or Childline 1098, as per POCSO compliance protocol.

6. Data Usage and Purpose Limitation

Children's data is used solely for non-commercial, non-advertising purposes, such as:

- Displaying personalized age-appropriate comics and stories;
- Saving story progress for return visits;
- Supporting learning or interactivity in a protected manner.

No child data is sold, rented, profiled, or used for behavioral targeting, and we do not display third-party ads to minors under any condition.

7. Data Retention and Deletion

We store children's data for the shortest period necessary. Parents or guardians can request deletion at any time by emailing:

E-mail: _____

All deletion requests are honored within 7 working days, and data backups are purged in compliance with the IT (Reasonable Security Practices and Procedures) Rules, 2011.

8. Cookies and Tracking for Children

Infinito Comics uses strictly essential, non-invasive cookies for children's accounts:

- No tracking for marketing or retargeting;
- No cookie sharing with third-party vendors;
- Cookie settings are visible and modifiable from the parent dashboard.

We follow the CERT-In guidelines (2022) for cookie usage transparency.

9. Data Security and Grievance Redressal

We use industry-grade AES-256 encryption, firewalls, and access control logs to secure all data, in compliance with Section 43A of the IT Act. Any breach, abuse, or violation is promptly handled by our appointed Grievance Officer.

We are committed to redressal within 15 days as per Rule 3(11) of the IT Rules, 2021.

10. Legal Disclosures and Compliance

We cooperate fully with Indian authorities, including the Cyber Crime Division, National Commission for Protection of Child Rights (NCPCR), and CERT-In, in case of:

- Any abuse of minors;
- Attempts to exploit platform vulnerabilities;
- Content reporting under Section 67B of the IT Act (prohibition of sexually explicit content involving children).

11. Accountability Statement

Infinito Comics hereby declares, on legal record, that:

“This platform is governed and operated with a child-first approach. We have taken all technological, procedural, and legal steps mandated by Indian law to ensure that children are not subjected to harm, abuse, or privacy breaches. Any accusations to the contrary shall be addressed through a documented demonstration of our safeguards.”

12. Updates to the Policy

This Children’s Privacy Policy may be updated as per future legal changes or platform upgrades. Parents will be notified by email and via a public update log on the website footer.